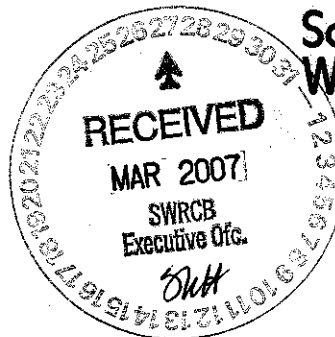


March 27, 2007

Tam M. Doduc, Chair, and Members
State Water Resources Control Board
1001 I Street, 24th Floor
P.O. Box 100
Sacramento, CA 95812-0100



**Santa Clara Valley
Water District**



Subject: 3/20/07 Board Meeting – Workshop Regarding Development of a Statewide Water Recycling Policy

Dear Chair Doduc and Members of the Board:

The Santa Clara Valley Water District (District) appreciates the opportunity to provide comments on the development of a statewide policy for water recycling. The District provides water resources management for Santa Clara County. We are the county's groundwater management agency, the wholesale recycled water supplier in portions of the county, and a partner with three other recycled water suppliers in the county. Our Board of Directors has adopted formal policies to both aggressively protect groundwater from contamination and expand recycled water use. Thus, we understand the balance that must be struck between water quality protection and water recycling. We believe this balance is best achieved at a local level. We offer the following comments on some of the issues raised by your staff.

Anti-Degradation Policy

We do not believe the State Water Board should modify Resolution 68-16 (Anti-Degradation Policy) to encourage water recycling. The Anti-Degradation Policy has served the State of California well for nearly 40 years. It clearly states the importance and value of maintaining high quality waters, but does not prohibit changes in water quality. The Anti-Degradation Policy achieves the appropriate balance between water quality protection and other benefits to the people of the State, including benefits achieved by water recycling. Thus, it is not necessary to modify the Anti-Degradation Policy.

Agency Coordination

It is understood that the State and Regional Water Boards are responsible for protecting water resource quality for all beneficial uses, now and in the future and the Department of Health Services (DHS) is responsible for protecting public health. These are distinct and separate responsibilities. Each agency should adopt the regulations and requirements necessary to carry out its own purpose and should defer to the other on issues in the other agency's purview. The State and Regional Water Boards should defer to DHS for determining regulations and requirements that are necessary to protect human health and, likewise, DHS should defer to the Water Boards for determining regulations and requirements for protecting and maintaining the beneficial uses of water resources.

Any statewide water recycling policy should also recognize the role of local water supply and groundwater management agencies. Achieving the balance between water resource protection and recycled water expansion is best done based on local conditions and needs, in consultation with local water supply and groundwater management agencies and consistent with groundwater management plans. It is important that statewide laws, policies, and regulations

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do not restrict a local water district or groundwater management agency's ability to implement projects that best meet their area's water management needs. Likewise, statewide standards should not compel local agencies to consider or implement projects that do not meet local needs and interests, or are inconsistent with local groundwater management plans.

We appreciate the opportunity to provide comments on this very important water resource management and protection issue. Water quality protection and increasing recycling water are both important goals.

We look forward to working with you, your staff, and other interested parties on the development of any statewide recycling policy. In the meantime, if you have any questions, please contact me at (408) 265-2607, extension 2035.

Sincerely,

Melanie Richardson
Assistant Operating Officer
Water Supply Management Division
Santa Clara Valley Water District
5750 Almaden Expressway
San Jose, CA 95118

By email to: commentletters@waterboards.ca.gov